

**BEFORE THE OFFICE OF CONGRESSIONAL CONDUCT
U.S. HOUSE OF REPRESENTATIVES
119th Congress, 2d Session**

**SUBMISSION OF INFORMATION PURSUANT TO RULE 3(A)
OCC Rules for the Conduct of Investigations**

Directed to: Staff Director and Chief Counsel, Office of Congressional Conduct

Date: September 2, 2026

1. Person Submitting This Information — Rule 3(A)(1)

The Honorable Chuck Edwards
1505 Longworth House Office Building
Washington, District of Columbia 20515
(202) 225-6401
representingNC11@edwardscloud.com

Affiliation: Member, U.S. House of Representatives (North Carolina, 11th District), 119th Congress.

2. Subjects of the Allegation — Rule 3(A)(2)

The Honorable Michael Guest, Chairman, Committee on Ethics
The Honorable Mark DeSaulnier, Ranking Member, Committee on Ethics

Each is a Member of the House, and the alleged conduct occurred after March 11, 2008. Rule 1. This submission concerns the exercise of the joint authority conferred on the Chairman and Ranking Member by Committee on Ethics Rule 18(a). It does not concern, and the Board is not asked to review, the votes of other Members of the Committee on the Report or the merits of the Committee's factual findings.

3. Dates of the Alleged Conduct — Rule 3(A)(3)

On or about April 20, 2026 through September 1, 2026.

4. Concise Statement of Facts — Rule 3(A)(4)

The Congressman has first-hand knowledge of the facts stated in paragraphs iv, vii, and viii. The remaining facts are drawn from the Committee's public Report, its public statements, and the documents identified in Section 7 below.

- i. No complaint initiated this matter. No staff member identified in the Committee's Report filed a complaint. The Committee initiated the review itself following media

- reporting, after issuing a public statement on April 20, 2026, inviting persons with information to come forward.
- ii. The review proceeded under Committee Rule 18(a), which authorizes the Chairman and Ranking Member jointly to “gather additional information concerning [an] alleged violation” and jointly to “take appropriate action *consistent with Committee Rules* to resolve the matter.”
 - iii. No Investigative Subcommittee was established under Committee Rule 19. No Statement of Alleged Violation was adopted. The Congressman was never served with a Statement of Alleged Violation, never filed an answer under Rule 22, and no adjudicatory hearing was held under Rule 23, at which each count must be proved by clear and convincing evidence.
 - iv. The Congressman cooperated throughout. He produced all responsive material in his possession — documents, e-mails, text messages, and telephone voice messages — and sat for a voluntary interview with the Chairman, the Ranking Member, and Committee counsel. He was not provided the allegations or the witness testimony in advance of that interview and answered questions without knowledge of much of what the Report would later contain. The Report itself finds that he cooperated.
 - v. The Committee provided a draft report to the Congressman’s counsel on July 31, 2026, disclosing that it had already voted to adopt the Report on July 22—12 days before receiving the Congressman’s Response. By adopting the Report before receiving that Response, the Committee foreclosed any meaningful opportunity for the Congressman’s evidence and arguments to be considered before the Committee finalized its factual findings, credibility determinations, conclusions, and recommendation of censure. The Congressman was permitted only to append a response to a decision the Committee had already made—not to be heard before that decision was reached. Three days later, on August 3, 2026, the Committee released its Report and recommended that the House adopt a resolution of censure. The House was not in session on August 3. The Committee permitted the Congressman and his counsel to review the Report and to append his Response in advance of release only after a coerced and purported waiver of his rights to further process under House Ethics rules.
 - vi. The Congressman did not waive any rights in accordance with Committee Rule 26(b). He never submitted a written request, signed by him, identifying the specific procedural rights or steps he sought to waive. Any oral communication by counsel therefore did not satisfy the Rule’s mandatory requirements and could not constitute a valid waiver. Nevertheless, the Committee treated legally deficient oral communication as authorization to bypass the procedures its own rules required.

- vii. The Report finds that the Congressman engaged in no sexual activity with, and made no explicit sexual proposition to, any staff member; that the matter does not implicate *quid pro quo* sexual harassment; and that he did not violate federal sexual harassment law. The censure recommendation rests entirely on House Rule XXIII, clauses 1 and 2 — the requirements that a Member “behave at all times in a manner that shall reflect creditably on the House” and “adhere to the spirit and the letter of the Rules of the House.”
- viii. The Report omits directly contrary evidence in the Committee’s possession. For example, the Report finds that the Congressman should have known that a former staff member “felt pressured” into a November 2025 trip, without addressing evidence, including a voice message from that individual, produced to the Committee, stating: “I’m still so excited for Vegas. It’s going to be so much fun.” Similarly, the Report ignores other substantial evidence contravening or casting doubt on the Committee’s conclusions. The Report also elides that the trip occurred after the staff member had ceased working in the congressional office and thus was not regulated by House or other employment rules.
- ix. The Report presents these relationships in one direction only. It catalogs gifts, messages, and invitations while omitting the reciprocal character of friendships that predated the Congressman’s service in Congress. Omissions include contact the staff members themselves initiated, invitations they accepted and expressed enthusiasm about, and social interactions the Committee’s own record shows were welcomed at the time. The Report likewise omits that the same generosity, including dinners, tickets, and gifts, was extended to numerous other staff members of both sexes, evidence bearing directly on the House gift rule’s exemption for gifts “based on a personal friendship,” House Ethics Manual 40–41 (2022), and on the Report’s inference of preferential treatment. Nor does the Report credit the Congressman’s contemporaneous statement to one of the staff members that she “set the boundaries, and I get to respect them.” At no time did either staff member indicate to the Congressman that his general behavior was unwelcome or that it made her uncomfortable. Whether the Committee’s one-sided account or the Congressman’s is correct is precisely what an Investigative Subcommittee and a Rule 23 adjudicatory hearing exist to test.
- x. The Chairman and Ranking Member’s August 3, 2026 joint statement announces that “there was substantial reason to believe” the Congressman violated House Rules. “Substantial reason to believe” is the Rule 19(f) predicate for adopting a Statement of Alleged Violation through an Investigative Subcommittee. No Investigative Subcommittee made that finding, and no Statement of Alleged Violation was adopted.

- xi. The Committee's own precedent resolved comparable and more serious conduct without a floor sanction. In *Savage* (H. Rept. 101-397) and *Hastings* (H. Rept. 113-663), the Committee issued a public report and took no further action. In *Kihuen* (H. Rept. 115-1041), where the Committee did act on more severe conduct, it proceeded through an Investigative Subcommittee. The Report acknowledges *Savage*, states that the Committee "does not agree" with it, and states that "[t]imes have changed."
- xii. Censure has been imposed for sexual misconduct in only two instances — Representatives Gerry Studds and Daniel Crane, both in 1983, each for an explicit sexual relationship with a minor House page.

5. Rule, Regulation, or Standard Allegedly Violated — Rule 3(A)(5)

House Rule XXIII, clauses 1 and 2 — the same provisions on which the censure recommendation against the submitter rests. Adherence to "the spirit and the letter of the Rules of the House" includes adherence to the Committee's own Rules, which are adopted pursuant to House Rule XI, clause 3.

- (a) **Committee Rules 19, 21, 22, 23, and 24.** Every path by which a sanction recommendation reaches the House floor runs through an Investigative Subcommittee (Rule 19), an adopted Statement of Alleged Violation supported by a finding of substantial reason to believe (Rule 19(f)), the respondent's answer (Rule 22), and an adjudicatory hearing at which each count is proved by clear and convincing evidence (Rule 23). The Rule 24 sanction authority — including censure — is reachable only after Rule 23 has produced a proved count. Rule 18(a) authorizes action "consistent with Committee Rules"; that phrase incorporates the Rules, it does not suspend them. Recommending the most severe sanction available on a Rule 18(a) information-gathering record exceeded the authority Rule 18(a) confers.
- (b) **House Rule XXIII, clauses 1 and 2.** Recommending censure without notice of specific counts, without an answer, without an opportunity to examine the evidence or confront the witnesses whose characterizations the Report adopts, and against an evidentiary standard the Rules reserve to a different proceeding, does not adhere to the letter or the spirit of the Rules of the House.
- (c) **Departure from precedent without process.** The Committee may revisit its precedent. It may not announce a change of view as a substitute for the procedures its Rules require before a floor sanction may issue — particularly where the conduct found here is materially less serious than the conduct the Committee declined to sanction in *Savage*.

Anticipated response. The Committee has stated that the submitter waived certain procedural steps after reviewing the draft report. The submitter did not, and could not, consent to a sanction recommendation the Committee's Rules do not authorize on a Rule 18(a) record. A respondent's

waiver of process may relieve the Committee of steps taken for the respondent's benefit; it cannot supply the Committee with authority its own Rules withhold. However, we reassert that the Committee could not bypass its own procedural rules in the absence of a valid Rule 26(b) waiver. Nevertheless, the Committee treated that legally deficient oral communication as authorization to dispense with the procedures its own rules required.

6. Potential Witnesses — Rule 3(A)(6)

- Rep. Chuck Edwards, submitter (through counsel, contact information above).
- Staff Director and Chief Counsel, Committee on Ethics [contact information available from the Committee].

7. **Documents — Rule 3(A)(7)**

1. Committee on Ethics, *In the Matter of Allegations Relating to Representative Chuck Edwards* (Aug. 3, 2026).
2. Response of Representative Chuck Edwards to the Committee Report (Aug. 3, 2026) (*attached*).
3. Statement of the Chairman and Ranking Member of the Committee on Ethics Regarding Representative Chuck Edwards (Aug. 3, 2026).
4. Committee on Ethics public statement (Apr. 20, 2026).
5. Draft report transmitted to counsel (July 31, 2026).
6. H. Res. 1498, adopted September 1, 2026.

8. **Declaration — Rule 3(A)(8)**

I acknowledge that section 1001 of title 18, United States Code, applies to the information provided in this submission. I declare that the statements of fact set forth above are true and correct to the best of my knowledge, information, and belief.


Hon. Chuck Edwards

9/15/2026
Date